

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ALPHONSE MATTHEWS,)	
Plaintiff,)	
)	No. 07 C 6926
v.)	
)	JUDGE KENDALL
CITY OF CHICAGO, Chicago Police Officers)	
CALVIN CHATMAN, Star 5532,)	MAGISTRATE JUDGE KEYS
JAMES ECHOLS, Star 12329,)	
HARRY MATHEOS, Star 18599, and)	
DIMITRIOS LAMPERIS, Star 20718,)	
)	
Defendants.)	

**AGREED MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFFS' COMPLAINT**

Defendant City of Chicago ("City"), by its attorney, Mara S. Georges, Corporation

Counsel, moves this court for an extension of time to answer or otherwise plead in response to Plaintiff's complaint until March 14, 2008, and in support states:

1. Plaintiff filed his six-count complaint on December 10, 2007. The complaint alleges federal claims under 42 U.S.C. § 1983 against four Chicago Police Officers as well as Illinois state law claims for Malicious Prosecution, and *Respondeat Superior* and statutory indemnification against the City.
2. Upon notice of the instant case, as in every case, counsel immediately made the necessary requests for relevant documents, in order to respond to the complaint. While most documents have been procured, there is one outstanding report which has yet to arrive. Because this report is specifically identified in plaintiff's complaint, without it, counsel cannot respond to plaintiff's complaint.

3. Defense counsel had previously requested a two-week extension of time on February 29, 2008, which the court granted. At the time, counsel believed that the necessary documents would be received in a timely manner. However, despite counsel's best intentions, she is still missing this partial report, without which, she cannot adequately answer the plaintiff's complaint.

4. Defendant's counsel spoke with plaintiff's counsel, Louis Meyer, on March 14, 2008, who agreed to this extension of time. During that conversation, Plaintiff's counsel, Louis Meyer, kindly offered to provide counsel with a copy of what he believed to be the missing report. However, neither attorney can be certain of the number of pages that actually make up the report. For this reason, Defendant City requests an extension of time to ensure that she has all of the necessary information in order to answer plaintiff's complaint.

5. Defense counsel remains hopeful that the necessary report will be received in a timely manner. However, because she has had difficulty in obtaining the report, the City requests until April 30, 2008 to answer or otherwise plead in response to the complaint. Counsel will make every effort to respond to plaintiff's complaint immediately upon receipt of the report, should it arrive in a more timely manner.

6. Although this is the City's third request for an extension of time, it is not made for purposes of undue delay, but only to allow the City an adequate opportunity to properly respond to Plaintiff's complaint. No prejudice will result to Plaintiff by the granting of this motion.

WHEREFORE, Defendant City requests this court grant its agreed motion for an extension of time to and including April 30, 2008, to answer or otherwise plead to Plaintiff's complaint.

Respectfully submitted,

MARA S. GEORGES
Corporation Counsel of the City of Chicago

By: /s/ *Gail L. Reich*
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